

**JUDGE'S COPY**

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

DERICK R. CONNES  
Plaintiff

Vs.

ROBERT W. HYMAN, ET. AL.,  
Defendants

No. ~~1:01-CV-00247~~  
(Currently Judge Rambo)

**FILED**  
HARRISBURG, PA

JUN 11 2001

MARY E. D'ANDREA, CLERK  
Per Deputy Clerk

**RULE 15(a) AMENDMENT TO 1983 ACTION**

CONNES NOW, Plaintiff, above named, and makes Rule 15(a) amendment, to the above captioned action, and adds the following:

1. The Complaint is respectfully amended to include the declaration that all defendants in this matter, are sued in their individual, as well as official capacities.
2. The following claim of deprivation of, and conspiracy against Const. Rights is added:  
**AGAINST DEFENDANT DRAGOVICH, AND HIS SUBORDINATES:  
MAILROOM EMPLOYEES  
AND MR. THOMAS JAMES DOC GRIEVANCE CO-ORDINATOR**

**VIOLATION OF, AND CRIMINAL CONSPIRACY AGAINST FIRST AMENDMENT RIGHTS  
PERSISTENT HARASSMENT THEFT, AND OBSTRUCTION OF PLAINTIFFS MAIL  
REFUSAL OF DRAGOVICH OR GRIEVANCE OFFICER TO CURE THIS ABUSE  
OBSTRUCTION OF JUSTICE, PLAINTIFFS RIGHT TO SEEK HELP, AND  
DELIBERATE INFLICTION OF MENTAL ANGUISH AND EMOTIONAL DISTRESS**

3. Plaintiff, since arriving at SCI Camp Hill, has sent multiple letters, seeking every form of aid and assistance, from pro-bono investigative assistance, to news media interview/investigation of his case. None of these letters have been answered, and it is hereby averred such correspondence is being illegally obstructed/stolen/tampered with, by Defendant Dragovich, and his Subordinates of both his Mailroom, and Security office.
4. Plaintiff has repeatedly rec. legal mail opened, including from U.S. Dept. of Justice, Federal Postal Inspector, Pa. Dept. of State, Pa. Pardon Board, some of these illegally opened legal correspondences, were missing items that were stated to be enclosed in them, and were not there, and had been stolen.
5. Plaintiffs multiple efforts to correspond with above named, and multiple other legal aid agencies, and media sources, are all unanswered, plaintiff spent years trying to locate an old friend, who could possibly help him, upon locating said friend, plaintiff rec. an immediate priority mail letter from same, stating he would do whatever he could to help, please write back. Plaintiff wrote back, and never heard from said friend again.
6. This illegal theft, and obstruction of my mail, and efforts to seek legal aid, and/or help in proving my innocence, is jeopardizing plaintiffs life, and inflicting unbearable mental anguish and emotional distress upon plaintiff, is a violation of his First Amend.

right to freedom of speech, and association, right to represent himself, and to access Courts and discover new evidence, and right to access news media, which is allowed by DOC rules, quite plainly, as is a prisoners right to file crim. charges, and/or apply for pardon. The illegal theft/confiscation/obstruction of plaintiffs mail, also is a direct violation of U.S. Const. Amend Four, illegal search and seizures provision, and is deliberate indifference, to plaintiffs Const. Rights.

7. Plaintiff repeatedly tried to contact postal inspector, to obtain complain forms, and never rec. them. Plaintiff complained to defendant Dragovich, about mailroom, which mailroom, promptly lied, and denied any ever having rec. any such letters from plaintiff.

Plaintiff sent new letter, to Def. Dragovich personally, and upon his rec. same, and sending same, I rec. the forms I had written for five times previously and never got.

8. Plaintiff then filed grievance against prison mailroom, and actors Brian Harris, and Robert Ginkle, this grievance was ignored/denied, without requested due process personal interview, allowing plaintiff to show proof of the multiple letters he has sent seeking help here, and his opened mail, by mailroom. DOC Grievance office, remanded it for the aforesaid interview. At this interview, I was lied to, and fed erroneous excuses, and nothing was received, with the aforesaid Harris and Ginkle. My grievance was then "quashed" without allowing me due process right, to refute or even see, said Ginkle and Harris's report, of personal interview. I went appeal to Dragovich, and informed him, his Staff had lied to me, and this was not resolved. He ignored this. I appealed to Main DOC office, for further proceedings in this matter, and due process right to see any findings made by Camp Hill, and then appeal those, as required by Grievance rules, and this was denied, by the aforesaid Thomas James, DOC Grievance Co-ordinator. I informed him, he was violating my rights, and I would amend suit, and include him/this issue in it, if this was not rectified, and these people made to stay out of my mail.

9. He denied this, and too this day, your plaintiff continues to be missing such, such mail here, at Camp Hill, and is intimidated to write for not knowing who is stealing his mail, and/or what is being done with it, and lack of any response to some sixty letters or more, over period of months, before, and after, still, grievance being filed.

10. This illegal conduct, is entirely consistent, with Def. Dragovich trying to prevent my minister from assisting me, and SCI Redview illegally blocking off my home phone, and is causing me extreme distress, and anguish, and, making me furious.

11. I want this stopped, and these people out of my mail, and all my correspondence, sent out, and that coming in to me, delivered to me. Accordingly I amend complaint to include this matter, request jury trial, and punitive and compensatory damages, in the sum of 100,000.00\$(one hundred thousand) dollars from Def. Dragovich, individually, and in official capacity, and from other parties/his subordinates hereby joined herein.

*[Signature]*  
Derrick R. Coombs OCT1990

Box 200 Camp Hill Pa. 17001-0200

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF PENNSYLVANIA

BERNARD R. COOKMAN  
Plaintiff

vs.

ROBERT A. GIBBS ET AL.  
Defendants

No. 1:01-CV-01471  
(Currently Judge Rando)

PROOF OF SERVICE

I hereby certify I have this fifth day of June, 2001, served the within Rule 15(a)  
amendment on the parties below, by deposit in private mail, addressed as follows:

Clerk of Court U.S. District Court  
215 Walnut St. Box 983  
Harrisburg Pa. 17109

Mr. Patrick S. Dawley DND (five copies, for him to serve his clients)  
Office of Atty. General  
Com. of Penn.  
11th Fl. Strawberry Square  
Harrisburg Pa. 17120

Signed in accordance with FRCP Rule 11, and submitted under penalty of perjury.

~~Not a Confidential Document~~

Bernard R. Cookman  
BERNARD R. COOKMAN JCT/800  
Box 306 Camp Hill Pa.  
17001-0206